REMARKS

Initially, Applicant would like to express his appreciation to the Examiner for the detailed Official Action provided, for the indication that the drawings are acceptable, and for the acknowledgement of Applicant's claim of priority and receipt of the certified copy of the priority document.

Upon entry of the above amendments, claims 1, 2 and 6 will have been amended. Claims 1-6 are currently pending. Applicant respectfully request reconsideration of the outstanding objections and allowance of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Applicant submits that entry of the present amendments after Final rejection is proper, and the same is respectfully requested. In this regard,

Applicant notes that the current amendments to independent claim 1 merely add subject matter similar to that which was previously recited in dependent claim 2.

Reconsideration of the rejections and allowance of the pending application in view of the foregoing amendments and following remarks are respectfully requested.

In the Office Action, claims 1-6 were rejected under 35 U.S.C. 103(a) as being unpatentable over the Admitted Prior Art (APA) of Figures 1-3 and the Description of the Related Art, in view of either DAOUD (U.S. Patent No. 5,989,062) or OTTO et al. (U.S. Patent No. 5,624,276).

Applicant respectfully traverses these rejections.

Claim 1 recites, inter alia, "a connector bracket attached to the airbag case, the connector bracket being inserted in the insertion opening of the clip and having an engagement hole provided at one side thereof so that the hook of the clip is engaged in the engagement hole, wherein the connector bracket includes an inserting part vertically formed at an upper end of a holding part and extending toward the insertion opening of the clip in a longitudinal direction of the airbag case."

Applicant submits that the APA lacks any disclosure of a connector bracket attached to airbag case and inserted in the insertion opening of a clip.

Applicant further submits that the APA lacks any disclosure of a connector bracket having an engagement hole provided at one side thereof so that the hook of the clip is engaged in the engagement hole.

In this regard, Applicant notes that the APA includes a connector bracket 20 having a supporting part 22 and a coupling part 23, as shown in Fig. 2. However, the connector bracket 20 is clearly not inserted in the insertion opening of a clip, much less having an engagement hole provided at one side thereof for engagement by the hook of the clip.

Applicant further submits that neither of DAOUD nor OTTO et al. discloses such a connector bracket. In this regard, Applicant notes that the elements 234 and 236 in DAOUD, which the Examiner has characterized as being a bracket with an engagement hole, are in fact a frame provided with a plurality of arms with openings extending perpendicular to a side of the frame (col. 3, lines 55-60). Furthermore, Applicant notes that OTTO et al. discloses a tongue 36 of a carrier

profile 34 having a recess 38, which the Examiner has characterized as being a bracket with an engagement hole (col. 1, lines 14-18). Accordingly, Applicant submits that DAOUD and OTTO et al. fail to teach or suggest connector brackets inserted in the insertion opening of a clip, much less having an engagement hole provided at one side thereof for engagement by the hook of the clip. Accordingly, Applicant submits that the teachings of DAOUD and OTTO et al. fail to cure the above-noted deficiencies of the APA device; and that even assuming, arguendo, that the teachings of the APA, DAOUD and OTTO et al. were to be combined as suggested by the Examiner, Applicant's claimed apparatus would not have resulted from the combined teachings thereof.

Applicant further submits that the disclosures of DAOUD and OTTO et al. are non-analogous to the airbag module bracket and connector of the APA, and that one having ordinary skill in the art of airbag modules would not have looked to such disparate teachings. In this regard, Applicant notes that APA is relevant to an apparatus for fixing a connector for an airbag module, while DAOUD and OTTO et al. are both directed to telecommunication devices. Applicant submits that the telecommunication devices of DAOUD and OTTO et al. are non-analogous to the APA apparatus for fixing a connector for an airbag module.

Applicant further submits that the modification suggested by the Examiner is clearly the result of impermissible hindsight reasoning, based upon the disclosure of the present application, rather than being based upon the teachings of the references themselves.

Applicant further submits that the APA lacks any disclosure of a connector bracket including an inserting part vertically formed at an upper end of a holding part and extending toward the insertion opening of the clip in a longitudinal direction of the airbag case.

In this regard, the Examiner's attention is directed to the exemplary embodiment depicted in Figure 5 of the present application, which includes a connector bracket 70 having an inserting part 76 vertically formed at an upper end of a holding part 74 and extending toward the insertion opening 62 of the clip 60 in a longitudinal direction of the airbag case 52.

Applicant further submits that neither of DAOUD nor OTTO et al. discloses a connector bracket *including an inserting part vertically formed at an upper end* of a holding part and extending toward the insertion opening of the clip in a longitudinal direction of the airbag case. Accordingly, Applicant submits that neither of DAOUD or OTTO et al. could reasonably be characterized as curing the above-noted deficiencies in the disclosure of the APA.

Thus, Applicant submits that the subject matter recited in claim 1 would not have been obvious to one having ordinary skill in the art.

Accordingly, Applicant submits that the rejection of claim 1 under 35 U.S.C. 103(a) is improper at least for each, and certainly for all, of the abovenoted reasons.

Applicant further submit that claims 2-6, which are at least patentable due to their dependency from claim 1, for the reasons noted above, recite additional features of the invention and are also separately patentable over the prior art of record.

For example, Applicant submits that none of the APA, DAOUD or OTTO et al., either alone or in any proper combination, disclose a connector bracket having a supporting part attached to an airbag case to support the connector; a holding part vertically extending from the supporting part; the inserting part being inserted into an insertion opening of a clip, and the inserting part having an engagement hole provided therein (claim 2), or a supporting part of a connector bracket being provided in such a manner that a connector supporting region of the supporting part is disposed at a position higher than that of a region attached to the side surface of a can housing so that the connector supporting region of the supporting part is connected to the region attached to the side surface of the can housing in the shape of a step with a predetermined height in the direction in which the connector supporting region of the supporting part is away from the can housing (claim 6).

Accordingly, Applicant submits that the rejection of claims 1-6 under 35 U.S.C. § 103(a) is improper at least for each, and certainly for all, of the abovenoted reasons, and withdrawal thereof is respectfully requested.

SUMMARY AND CONCLUSION

Entry and consideration of the present amendment, reconsideration of the outstanding Official Action, and allowance of the present application and all of the claims therein are respectfully requested and now believed to be appropriate.

Applicant has made a sincere effort to place the present application in condition for allowance and believe that they have now done so.

Any amendments to the claims that have been made in this amendment, which do not narrow the scope of the claims, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered cosmetic in nature, and to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

As noted above, the current amendments to independent claim 1 merely add subject matter similar to that which was previously recited in dependent claim 2. Accordingly, Applicant submits that the above amendments do not require further consideration or search, do not introduce any prohibited new matter, and clearly place the application in condition for allowance. Thus, the Examiner is respectfully requested to enter the amendments and provide an early indication of allowance of the application.

Should there be any questions or comments, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,

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